

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KARA ELIZABETH BLACK, on behalf of herself and
others similarly situated in the proposed FLSA 22-cv-1447(VEC)
Collective Action,

Plaintiff,

DECLARATION

v.

CAKOR RESTAURANT, INC. BRIDGE CAFÉ, INC.,
ISMET SUJAK, and SULTANIA SUJAK,
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I, **ISMET SUJAK**, under penalty of perjury and in lieu of affidavit as permitted by 28 U.S.C. §1746, declare as follows:

1. I submit this declaration in opposition to Plaintiff's motion for injunctive relief and leave to amend the Complaint.
 2. I have personal knowledge of the statements made herein, except those made upon information and belief. As to those statements, I believe them to be true.
 3. I have read the allegations in the Affidavit of Ard Puka filed June 16, 2022, Affidavit of Plaintiff Karen Black filed June 16, 2022. and the Declaration of Jason Mizrahi, Esq. filed June 16, 2022 filed in support of the Plaintiff's motion for emergency motion for a preliminary injunction, restraining Defendants Cakor Restaurant, Inc., Bridge Cafe Inc., Sultania Sujak and me from harassing, intimidating, or retaliating against Plaintiff and in support of Plaintiff's motion for leave to file a first amended complaint, pursuant to Fed.R.Civ.P. 15(a)(2) alleging retaliation. I deny the allegations in Mr. Puka's and Ms. Black's affidavit and Mr. Mizrahi's Declaration that my family and I are retaliating against Ms. Black for filing her complaint or for her alleged wage complaints. I deny that Ms. Black was paid improperly for any work she performed for Cakor Restaurant, Inc. The Court should deny Plaintiff's motion to amend her Complaint since the proposed amendments to the Complaint have no basis in fact and are filed for an improper purpose. The Court should deny Plaintiff's request for injunctive relief as it is an extraordinary
- Page 1 of 2.

remedy and there is no need for injunctive relief since the Plaintiff has not shown she is subject to irreparable harm if injunctive relief is not granted.

4. For the foregoing reasons I request the Court deny Plaintiff's motion together with such other and further relief the Court deems just and proper.

Duly executed on August 1, 2022.

Ismet Sujak
ISMET SUJAK